

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
NICOLE DONNETTE STEELEY)	Case No. 19-34628-KRH
)	Chapter 13
Debtor)	

AMENDED MOTION TO INCUR DEBT

COMES NOW, the Debtor, by counsel, and as and for Debtor's Amended Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on September 5, 2019.
2. The Debtor has applied for and Movement Mortgage, LLC has approved a loan to the Debtor in the amount of \$311,258.00 plus interest at 2.625% per annum to be repaid with 360 equal monthly payments of approximately \$1,250.17 for principal and interest (\$1,751.00 including escrow for taxes and insurance) for the purchase of a home located at 10406 Brynmore Drive, North Chesterfield, Virginia 23237. The closing costs are to be paid by the Debtor's spouse and mother-in-law. A copy of the Loan Estimate is attached hereto as Exhibit "A" and is incorporated herein by this reference.
3. The purchase price of the Property is \$317,000.
4. There will be no loan proceeds payable to the Debtor.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

5. The purchase of the Property is in the best interest of the Debtor and will facilitate the Debtor's ability to perform under her Chapter 13 Plan filed herein.

6. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

NICOLE DONNETTE STEELEY

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

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AMENDED NOTICE OF MOTION AND HEARING

The above Debtor has filed an Amended Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **November 3, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

- **REMOTE HEARING INFORMATION:**

Due to the COVID-19 public health emergency, no in-person hearings are being held.

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the “Zoom Request Form”), which is available on the Court's internet website at www.vaeb.courts.gov, on the page titled, “Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information.” Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

***The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge’s attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

***** PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: November 2, 2021

NICOLE DONNETTE STEELEY

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

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/s/ James E. Kane

James E. Kane

MOVEMENT MORTGAGE, LLC
8024 CALVIN HALL ROAD · INDIAN LAND, SC 29707

Save this Loan Estimate to compare with your Closing Disclosure.

Loan Estimate

DATE ISSUED 10/08/2021
APPLICANTS NICOLE DONNETTE STEELEY and ROBBIE JOHNSON
6306 BERGEN DRIVE
RICHMOND, VA 23225
PROPERTY 10406 BRYNMORE DRIVE
NORTH CHESTERFIELD, VA 23237
SALE PRICE \$317,000

LOAN TERM 30 years
PURPOSE Purchase
PRODUCT FIXED RATE
LOAN TYPE ☐ Conventional ☒ FHA ☐ VA ☐
LOAN ID# 3271739
RATE LOCK ☐ NO ☒ YES, until 10/18/2021 AT 8:00 PM EDT
Before closing, your interest rate, points, and lender credits can change unless you lock the interest rate. All other estimated closing costs expire on

Loan Terms		Can this amount increase after closing?	
Loan Amount	\$311,258	NO	
Interest Rate	2.625%	NO	
Monthly Principal & Interest <i>See Projected Payments below for your Estimated Total Monthly Payment</i>	\$1,250.17	NO	
Prepayment Penalty		Does the loan have these features? NO	
Balloon Payment		NO	
Projected Payments			
Payment Calculation		Years 1-30	
Principal & Interest		\$1,250.17	
Mortgage Insurance	+	214	
Estimated Escrow <i>Amount can increase over time</i>	+	287	
Estimated Total Monthly Payment		\$1,751	
Estimated Taxes, Insurance & Assessments <i>Amount can increase over time</i>	\$294 a month	This estimate includes <input checked="" type="checkbox"/> Property Taxes <input checked="" type="checkbox"/> Homeowner's Insurance <input checked="" type="checkbox"/> Other: ASSOCIATION DUES <i>See Section G on page 2 for escrowed property costs. You must pay for other property costs separately.</i>	In escrow? YES YES NO
Costs at Closing			
Estimated Closing Costs	\$22,330	Includes \$16,503 in Loan Costs + \$5,827 in Other Costs - \$0 in Lender Credits. <i>See page 2 for details.</i>	
Estimated Cash to Close	\$8,272	Includes Closing Costs. <i>See Calculating Cash to Close on page 2 for details.</i>	

Loan Costs

B. Services You Cannot Shop For		\$6,350
APPRAISAL		\$575
CREDIT REPORT FEE		\$160
FHA UPFRONT MIP		\$5,353
FINAL INSPECTION FEE		\$175
FLOOD CERTIFICATION FEE		\$7
IRS TRANSCRIPT FEE		\$40
VOE FEE		\$50

D. TOTAL LOAN COSTS (A + B + C)	\$16,503
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E. Taxes and Other Government Fees	\$2,221
Recording Fees and Other Taxes	\$127
Transfer Taxes	\$2,094

G. Initial Escrow Payment at Closing			\$1,676
Homeowner's Insurance	\$67.25 per month for	2 mo.	\$135
Mortgage Insurance		per month for	mo.
Property Taxes	\$220.10 per month for	7 mo.	\$1,541

I. TOTAL OTHER COSTS (E + F + G + H)	\$5,827
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Calculating Cash to Close

PAGE 2 OF 3 - LOAN ID # 3271739

Additional Information About This Loan

LENDER
NMLS / ____ LICENSE ID
LOAN OFFICER
NMLS / ____ LICENSE ID
EMAIL
PHONE

MOVEMENT MORTGAGE, LLC
39179
NICK BOHN
450883
BOHNTEAM@MOVEMENT.COM
(540) 907-5627

MORTGAGE BROKER
NMLS / ____ LICENSE ID
LOAN OFFICER
NMLS / ____ LICENSE ID
EMAIL
PHONE

Comparisons		Use these measures to compare this loan with other loans.
In 5 Years	\$104,118	Total you will have paid in principal, interest, mortgage insurance, and loan costs.
	\$36,458	Principal you will have paid off.
Annual Percentage Rate (APR)	3.864%	Your costs over the loan term expressed as a rate. This is not your interest rate.
Total Interest Percentage (TIP)	44.702%	The total amount of interest that you will pay over the loan term as a percentage of your loan amount.

Other Considerations	
Appraisal	We may order an appraisal to determine the property's value and charge you for this appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close. You can pay for an additional appraisal for your own use at your own cost.
Assumption	If you sell or transfer this property to another person, we <input checked="" type="checkbox"/> will allow, under certain conditions, this person to assume this loan on the original terms. <input type="checkbox"/> will not allow assumption of this loan on the original terms.
Homeowner's Insurance	This loan requires homeowner's insurance on the property, which you may obtain from a company of your choice that we find acceptable.
Late Payment	If your payment is more than 15 days late, we will charge a late fee of 4% of the overdue monthly principal and interest payment.
Refinance	Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.
Servicing	We intend <input type="checkbox"/> to service your loan. If so, you will make your payments to us. <input checked="" type="checkbox"/> to transfer servicing of your loan.

Confirm Receipt	
By signing, you are only confirming that you have received this form. You do not have to accept this loan because you have signed or received this form.	
NICOLE DONNETTE STEELEY 10/08/2021	
NICOLE DONNETTE STEELEY	Date
ROBBIE JOHNSON	Date

Alfredo Sunga
c/o JFB Management
410 N. Ridge Rd. Suite 100
Henrico, VA 23229

Ballato Law Firm
3721 Westerre Parkway
Suite A
Henrico, VA 23233

Bank of America
Attn: Bankruptcy
P.O. 982284
El Paso, TX 79998

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Capital One Auto Finance
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Carmel Holding Co
10660 Argonne Dr.
Glen Allen, VA 23060

Check Into Cash
3059 Mechanicsville Tnpk
Richmond, VA 23223

City of Richmond
Parking Tickets
P.O. Box 26508
Richmond, VA 23261

City of Richmond
900 E Broad Street
Room 109 Delinquent Taxes
Richmond, VA 23219

CJW Medical Center
PO Box 99400
Louisville, KY 40269

Continental Finance Company
Attn: Bankruptcy
Po Box 8099
Newark, DE 19714

Credit Acceptance
25505 W. Twelve Mile Rd
Ste. 3000
Southfield, MI 48034

Emergency Coverage Corp.
c/o ARS
PO Box 8668
Coral Springs, FL 33075-8668

Express Lanes
PO Box 28148
New York, NY 10087

First Premier Bank
Attn: Bankruptcy
Po Box 5524
Sioux Falls, SD 57117

Focused Recovery Solutions
9701-Metropolitan Ct
Ste B
North Chesterfield, VA 23236

Genesis Bc/celtic Bank
Attn: Bankruptcy
268 South State Street Ste 300
Salt Lake City, UT 84111

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101

Mariner Finance
13102 Midlothian Tnpk.
Midlothian, VA 23113

Maryland Transportation Auth.
PO Box 17600
Baltimore, MD 21297

NetCredit
175 W. Jackson Blvd., Suite 1000
Chicago, IL 60604

New York State Dept of Tax
NYS Assesment Receivables
P.O. Box 4127
Binghamton, NY 13902

NYC Housing Authority
250 Broadway, 9th Floor
New York, NY 10007

PayPal
PO Box 105658
Atlanta, GA 30348-5658

Paypal
ATTN BANKRUPTCY
Po Box 45950
Omaha, NE 68145

Plaza Services, Llc
Attn: Bankruptcy
110 Hammond Dr. Ste 110
Atlanta, GA 30328

Professional Account Mgmt
386 Pickett St
PO Box 22147
Alexandria, VA 22304

Radiology Assoc of Richmond
PO Box 13343
Richmond, VA 23225

Receivables Management Systems
PO Box 17305
Richmond, VA 23226

Shawn C. Tuthill
c/o Liberty Homes Inc
8249 Crown Colony Parkway A
Mechanicsville, VA 23116

Square Inc.
1455 Market St.
Suite 600
San Francisco, CA 94103

The Port Authority
PO Box 15183
Albany, NY 12212

Violations Processing Center
EZ-Pass NY
P.O. Box 15186
Albany, NY 12212

Virginia Dept. of Taxation
P O Box 2156
Richmond, VA 23218

Wells Fargo Dealer Services
Attn: Bankruptcy
Po Box 19657
Irvine, CA 92623